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PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

ROSITA SABROSSO-RENNICK

PLAINTIFF,

VS.

NORTH CAROLINA STATE
TREASURER

DEFENDANT,

Civil Case No
5:17-cv-114-BO

PLAINTIFF'S INITIAL DISCLOSURES

Pursuant to Rule 26(a) and the Federal Rules of Civil Procedure, The Court's Scheduling Order Plaintiff Rosita Sabrosso-Rennick ("hereinafter "Plaintiff" or "Ms. Rennick") submits her initial disclosures to North Carolina State Treasurer ("Defendant"). Plaintiff has not yet completed discovery concerning the factual basis of her claims and proofs. Notwithstanding Plaintiff's good faith efforts, Plaintiff may not yet have discovered facts, legal theories, witnesses or documents, or inadvertently may have omitted facts, legal theories, witnesses or documents from this amended disclosure statement, which later may be deemed relevant. As additional information is discovered, Plaintiff will supplement this disclosure statement.

By providing these initial disclosures, Plaintiff does not represent that she is identifying every document, tangible thing or witness possibly relevant to this action. In addition, these disclosures are made without Plaintiff in any way waiving her right to object to any discovery request or proceeding involving or relating to the subject matter of these disclosures on any grounds, including competency, privilege, relevancy and materiality, hearsay, undue burden, confidentiality, or any other appropriate grounds.

Each and every disclosure set forth below is subject to the above qualifications and limitations.

I. Names, Addresses and Telephone Numbers of Individuals Likely to Have Discoverable Information.

Pursuant to F.R.C.P. 26(a), the following is a list of those individuals whom Plaintiff believes are likely to have discoverable information that Plaintiff may use to support his claims, proofs and burdens, and the subject of that information: Please see "Attachment A" - *Rule 26(a) Initial Disclosure of Individuals Likely to Have Discoverable Information, herein incorporated by reference.*

II. All Documents and Tangible Things in Plaintiff's Possession.

The following documents are in the control or possession of Plaintiff: Please see "Attachment B" *Rule 26(a) Initial Disclosure of Documents and Tangible Things in Plaintiff's Possession, herein incorporated by reference.*

III. Computation of Damages Claimed by Plaintiff

Pursuant to F.R.C.P. 26(a)(1)(C), the following is a statement of damages claimed by Defendant: Please see "Attachment C" - *Rule 26(a) Initial Disclosure of Damages Claimed by Plaintiff, herein incorporated by reference.*

IV. Insurance

Plaintiff does not have any insurance coverage of which she is aware that would provide coverage for any claims arising out of this lawsuit.

Respectfully Submitted,



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PLAINTIFF